



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Mary E. Matiya, Treasurer
Staley Political Action Committee of
A E Staley Manufacturing Company
2200 East Eldorado Street
Decatur, IL 62521

FEB 4 2000

Identification Number: C00056564

Reference: Mid-Year Report (1/1/99-6/30/99)

Dear Ms. Matiya:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the words "payroll deduction". 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dominick Ciaraldi".

Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedules for each category on the Covered Business Page	PAGE OF FOR LINE NUMBER 11(a)(1)
Contributions from Individuals			
Any information shown from such Reports and Statements may not be used or used in any manner for the purpose of avoiding contributions or for determining deductibility. Other than using the name and address of the person contributing to such contributions from such contributions.			
NAME OF COMMITTEE (in Full)		000000001	
National Organization PAC			
A. Full Name, mailing address and ZIP Code			
Name of Employee		Date received (see year)	Amount of Each Receipt (see Form)
Anne Sullivan 231 18th Street City, State ZIP		National Organization, Inc. payroll deduction	\$72.00
Occupation			
Branch Manager			(\$12 biweekly)
Amount for 1998 > 1		228.00	
B. Full Name, mailing address and ZIP Code			
Name of Employee		Date received (see year)	Amount of Each Receipt (see Form)
Rodney Jones 881 Hainsbury Road City, State ZIP		National Organization, Inc. payroll deduction	\$180.00
Occupation			
Vice President			(\$20 biweekly)
Amount for 1998 > 1		360.00	

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor, 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$12 per pay period (each pay period is two weeks for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's contributions as "unitemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are \$180 — still below the \$200 itemization threshold. By September 30 — the closing date for the October quarterly report — the manager's contributions reach \$228. Therefore, the committee itemizes the total contributions received from the manager during the third quarter (\$120), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount), 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

Appreciated Goods

When a committee receives an in-kind contribution whose value may

IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedules for each category on the Covered Business Page	PAGE OF FOR LINE NUMBER 11(c)(1)
Contributions from Individuals			
Any information shown from such Reports and Statements may not be used or used in any manner for the purpose of avoiding contributions or for determining deductibility. Other than using the name and address of the person contributing to such contributions from such contributions.			
NAME OF COMMITTEE (in Full)		000000001	
National Organization PAC			
A. Full Name, mailing address and ZIP Code			
Name of Employee		Date received (see year)	Amount of Each Receipt (see Form)
Martin L. Evans 4 River Road City, State ZIP		National Organization, Inc. 8/18/98	\$5,999.00 (IN-KIND) (RAFFLE PRIZE)
Occupation			
CHAIRMAN			
Amount for 1998 > 1		5,999.00	

SCHEDULE B ITEMIZED DEDUCTIONS		Use separate schedules for each category on the Covered Business Page	PAGE OF FOR LINE NUMBER 21(b)
Operating Expenditures/Other Federal			
Any information shown from such Reports and Statements may not be used or used in any manner for the purpose of avoiding contributions or for determining deductibility. Other than using the name and address of the person contributing to such contributions from such contributions.			
NAME OF COMMITTEE (in Full)		000000001	
National Organization PAC			
A. Full Name, mailing address and ZIP Code			
Purpose of Contribution		Date received (see year)	Amount of Each Contribution (see Form)
raffle prize		8/18/98	\$5,999.00 (IN-KIND CONTRIBUTION)
Contribution for <input type="checkbox"/> Primary <input type="checkbox"/> General			
Date received			

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

